

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

(1) MICHAEL DELONG,  Plaintiff,  v.  (1) STATE OF OKLAHOMA <i>ex rel</i> THE OKLAHOMA DEPARTMENT OF MENTAL HEALTH AND SUBSTANCE ABUSE SERVICES; (2) THE BOARD OF DIRECTORS FOR THE OKLAHOMA DEPARTMENT OF MENTAL HEALTH AND SUBSTANCE ABUSE SERVICES, <i>et al</i>	Case No. 5:14-cv-01439-C
  Defendants.	

**SUPPLEMENT TO THE WITNESS AND EXHIBIT LISTS OF DEFENDANTS  
STATE OF OKLAHOMA EX REL. THE OKLAHOMA DEPARTMENT OF  
MENTAL HEALTH AND SUBSTANCE ABUSE SERVICES AND THE BOARD  
OF DIRECTORS FOR THE OKLAHOMA DEPARTMENT OF MENTAL  
HEALTH AND SUBSTANCE ABUSE SERVICES**

Defendants, State of Oklahoma *ex rel* The Oklahoma Department of Mental Health and Substance Abuse Services and The Board of Directors for the Oklahoma Department of Mental Health and Substance Abuse Services (“Defendants”) submit their Supplement to the Witness and Exhibit Lists filed on March 29, 2016 as follows. These documents were referred to in the deposition of Plaintiff, and/or produced in a binder to Plaintiff at the deposition.

## **EXHIBIT LIST**

<b><u>No.</u></b>	<b><u>Description</u></b>	<b><u>Identification/Bates Label</u></b>	<b><u>Expectation</u></b>
32.	M. DeLong's Medical Records from Integris Medical Center	Poff v. ODMHSAS 000002-000016	May Use
33.	List of jobs M. DeLong applied for	Poff v. ODMHSAS 000037-000041	May Use
34.	ODMHSAS Investigative Process Video	ODMH 001542	May Use
35.	All documents and exhibits in the binder of exhibits that were produced to Plaintiff at Plaintiff's deposition in December 2015	Binder Produced at Plaintiff's Deposition	May Use

Discovery is still ongoing in this case; as a result, Defendants reserve the right to amend its Final Witness and Exhibit Lists to the extent additional witnesses and/or documents are identified through the course of further discovery.

Respectfully submitted,

/s/ Victor F. Albert

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Health and Substance Abuse Services and The  
Board of Directors for The Oklahoma  
Department of Mental Health and Substance  
Abuse Services*

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 1st day of April 2016, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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